

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

CRISTA STEVENS

Plaintiff,

V.

KEYSTONE CREDIT SERVICES, LLC

Defendant.

CASE NO. 3:21-cv-01830-MEM

JOINT STIPULATION TO EXTEND DEADLINES

The parties, by and through their undersigned counsel, hereby submit this joint request to extend the discovery deadlines by 31 days for the fact discovery deadline and 30 days for the dispositive motion deadline in this action. The parties make this request because additional time is needed to conclude discovery. Counsel for the parties have amicably been exchanging in written discovery and the production of documents and additional time is needed to conclude discovery, depositions and explore the potential for resolution of this case. Depositions were to be completed but counsel for Defendant is attached to start trial on March 14th through March 24th.

The parties believe they will not require any additional discovery extensions beyond that which is requested herein. The requested adjusted deadlines are:

Fact Discovery

April 24, 2023

Dispositive Motions

May 26, 2023

FREEMAN LAW

BY: /s/ Brett Freeman

BRETT FREEMAN, ESQ.
210 Montage Mountain Road
Moosic, PA 18507
ATTORNEY FOR PLAINTIFF

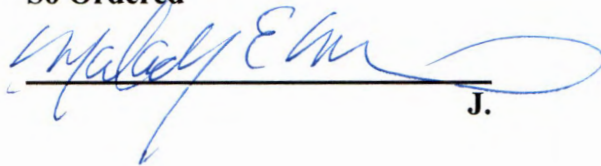
LEWIS BRISBOIS BISGAARD & SMITH, LLP

BY: /s/ Lee J. Janiczek

LEE J. JANICZEK, ESQ.
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Wayne, PA 19087
ATTORNEY FOR DEFENDANT

Dated: March 14, 2023

So Ordered


_____ J.